

# **Proposed Specific Regulatory Level Chemical Causing Cancer: Glyphosate**

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**From:** [kwallace@professionalsltd.com](mailto:kwallace@professionalsltd.com)  
**To:** [P65Public Comments](#)  
**Subject:** Glyphosate NSRL - Glyphosate causes breast cancer at .000000000001  
**Date:** Tuesday, June 06, 2017 6:34:20 PM  
**Importance:** High

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Ms. Esther Barajas-Ochoa  
Office of Environmental Health Hazard Assessment  
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Sacramento, California 95812-4010  
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Dear Ms Barajas-Ochoa:

I am member of the Food & Beverage Safety Committee, American Chamber of Commerce and business owner involved in the food industry. I submit the following information showing that glyphosate causes breast cancer via estrogen receptor cells. I am currently in discussion with the US Environmental Protection Agency scientific review committee on this issue as their allowable standards for glyphosate are 19,000 times the level which causes breast cancer. The type of cancer caused by glyphosate accounts for more than 50% of all breast cancers. The EPA's own reviewer acknowledges that the EPA did not follow good laboratory practice in its Weight of Evidence. The Weight of Evidence omitted 700 studies similar to the following:

Glyphosate induces human breast cancer cells growth via estrogen receptors (2013)

<https://www.ncbi.nlm.nih.gov/pubmed/23756170>

Sri Lanka Partially Bans Glyphosate for Deadly Kidney Disease Epidemic

[http://www.i-sis.org.uk/Sri\\_Lanka\\_partially\\_bans\\_glyphosate.php](http://www.i-sis.org.uk/Sri_Lanka_partially_bans_glyphosate.php)

Pesticide Mixtures, Endocrine Disruption, and Amphibian Declines: Are We Underestimating the Impact?

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1874187/>

Your proposed "safe" standard is actually quite carcinogenic. I enclose the abstract from pubmed/23756170 for your reference.

All the best,

Kurt Wallace, MBA, MA, BSME  
Food Safety Committee

Format: Abstract Full text links Food Chem Toxicol. 2013 Sep;59:129-36. doi: 10.1016/j.fct.2013.05.057. Epub 2013 Jun 10.

Glyphosate induces human breast cancer cells growth via estrogen receptors.

□□□Thongprakaisang S1 Author information  
, Thiantanawat A, Rangkadilok N, Suriyo T, Satayavivad J.

Abstract

Glyphosate is an active ingredient of the most widely used herbicide and it is believed to be less toxic than other pesticides. However, several recent studies showed its potential adverse health effects to humans as it may be an endocrine disruptor. This study focuses on the effects of pure glyphosate on estrogen receptors (ERs) mediated transcriptional activity and their expressions. Glyphosate exerted proliferative effects only in human hormone-dependent breast cancer, T47D cells, but not in hormone-independent breast cancer, MDA-MB231 cells, at 10<sup>-12</sup> to 10<sup>-6</sup>M in estrogen withdrawal condition. The proliferative concentrations of glyphosate that induced the activation of estrogen response element (ERE) transcription activity were 5-13 fold of control in T47D-KBluc cells and this activation was inhibited by an estrogen antagonist, ICI 182780, indicating that the estrogenic activity of glyphosate was mediated via ERs. Furthermore, glyphosate also altered both ERα and β expression. These results indicated that low and environmentally relevant concentrations of glyphosate possessed estrogenic activity. Glyphosate-based herbicides are widely used for soybean cultivation, and our results also found that there was an additive estrogenic effect between glyphosate and genistein, a phytoestrogen in soybeans. However, these additive effects of glyphosate contamination in soybeans need further animal study.

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**KEYWORDS:** Estrogenic effect; Genistein; Glyphosate; Human breast cancer; T47D; T47D-KBluc